

Grassy Plains Network and VNPA response to: Draft Casey Fields South and Devon Meadows PSPs



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1. Executive summary

1.1. Who we are

The Victorian National Parks Association (VNPA) is one of Victoria's leading nature conservation organisations. It is an independent, non-profit, membership-based group, which for 70 years has existed to protect Victoria's unique natural environment and biodiversity through the establishment and effective management of national parks, conservation reserves and other measures.

The Grassy Plains Network represents land management professionals, academics, ecologists and community members concerned about the ongoing decline of grassy ecosystems across Melbourne and its surrounds. We advocate for improved grassland protection and management. We are part of the VNPA.

1.2. Key points

- The draft PSPs fail to adequately protect Southern Brown Bandicoot as is required by the Sub-regional Species Strategy for the Southern Brown bandicoot. Among many matters, the PSPs don't capture priority Southern Brown Bandicoot habitat, provide the necessary connectivity, ensure protection of understorey, ensure adequate habitat corridors with appropriate controls, or suggest how implementation and compliance are to be guaranteed.
- We are surprised by the extent to which the excellent recommendations of the WSP Casey Fields South and Devon Meadows Biodiversity Assessment Report 2025 Update have been mostly ignored.
- The Casey Fields South and Devon Meadows Biodiversity Assessment Report 2025 Update contains important details and recommendations that need to be actioned, as well as captured within PSP Requirements or through other mechanisms that will guarantee their delivery.
- Further Southern Brown Bandicoot survey is likely to be needed.
- VPA should satisfy itself that the stakeholders can appropriately implement the necessary protections for Southern Brown Bandicoot. Given the known failures to provide oversight and compliance documented across the rest of the Melbourne Strategic Assessment area, it is not hard to imagine that serious impacts will occur to Southern Brown Bandicoot and the infrastructure designed to protect them.
- Melbourne Water needs to redesign the form of its drainage assets to avoid construction impacts to trees marked for retention.
- We welcome the presence of areas of increased density, but note it is important that the efforts are made to reduce the impacts of such residential form on the considerable ecological assets throughout the PSP. Overshadowing is of major concern. This is true of all urban built form.
- More attention needs to be given to the interfaces with areas of natural value and ecologically important drainage assets. For instance, overshadowing, lightspill, noise, fencing, road crossings to minimise vehicle–fauna interactions need to be addressed.

- These interface design matters need to be fully costed and built-in to forward planning.
- Integrated Water Management (IWM) solutions need to be at PSP scale. We need a recycled water system such as Aurora has. There are existing recycled water pipes through the PSPs. We need some department or organisation to take active responsibility for this. At the moment the fallback on PSP guidelines and suggestions of options means that IWM will be mostly ignored by developers because of the failure to act of a group of well-meaning but risk-adverse governance institutions.
- Four significant patches of native grassland could be incorporated into public open space and drainage services through some sensitive repositioning of open space.
- VPA needs to be particularly vigilant to ensure that these fast-tracked PSPs do not fast track high impacts to vulnerable populations of Southern Brown Bandicoot.

1.3. Discussion

1.3.1. Importance of Southern Brown Bandicoot protections

The primary ecological goal of these PSPs is to provide for Southern Brown Bandicoots. The draft PSP fails to adequately do that.

The Melbourne Strategic Assessment was a deal that opened up the growth corridors to developers and gave them certainty and a streamlined approvals process. In return, certain Matters of National Environmental Significance had to be protected.

We all know how poorly nature has fared to date under the Melbourne Strategic Assessment. Many years of poor management and inept implementation led to a scathing Victorian Auditor General's Office report. Weeds are out of control, land acquisition is dragging, and developers are getting away with clearing supposedly protected land.

In the east of Melbourne, Southern Brown Bandicoot must be protected. That means making their protection a genuine priority. It does not mean acceding to developer demands for higher net developable area targets or letting poor drainage design unnecessarily impact habitat. It does not mean paying lip-service to the idea of a Southern Brown Bandicoot corridor.

Incidentally, almost all the levies paid by developers in the east go to supporting the Conservation Areas and the Western Grassland reserve in Melbourne's north and west. Establishing strong Bandicoot corridors and associated public space in the east is the only way the east can benefit from the developer levies.

To be clear, developers have got huge gains from the Melbourne Strategic Assessment. The Bandicoots haven't. The VPA has to ensure this miserable imbalance is addressed.

1.3.2. How to ensure detailed provisions are understood and complied with?

One of the major concerns we have is that significant details of how vegetation is to be cleared or retained, culverts created, and drainage assets supplied, are held in documents such as the WSP report *Casey Fields South and Devon Meadows Biodiversity Assessment Report 2025 Update*. This is not a binding document, and its important recommendations need to be captured as Requirements within the PSP or otherwise elsewhere within the Melbourne Strategic Assessment provisions.

Moreover, these need to be captured in a way that is readily understood and able to be implemented by those who actually implement the consequences of the Melbourne Strategic Assessment, e.g. Casey planners, Melbourne Water, roads authorities, developers, and all the subcontractors involved.

How do we ensure compliance? Do these authorities have the will and the resources that can guarantee development of these PSPs will occur with the Southern Brown Bandicoot's best interests foregrounded?

The current guidelines for implementation are a recipe for disaster. One can easily foresee a range of scenarios leading to poor outcomes. Imagine a contractor spraying out weedy vegetation and removing the vital foliage cover required for Southern Brown Bandicoot corridor connectivity. Imagine how many residents will have cats despite Council requirements saying otherwise. Imagine developers avoiding IWM options. The list is endless.

The reality of the Melbourne Strategic Assessment in Melbourne's west is that developers ignore their responsibilities, and councils are too under-resourced or risk-adverse to be proactive in protecting what they are supposed to.

It would be negligent of the VPA to not consider how the on-ground reality of these PSPs is going to unfold. To that end they must include Requirements that may sit beyond the usual planning considerations. They must make sure good outcomes happen despite an inordinate degree of delegation of authority and no doubt self-reporting.

1.3.3. PSP inadequacies re Southern Brown Bandicoot

The provisions for Southern Brown bandicoot are insufficient. For instance:

- The corridors and public open space fail to capture much of the land identified as priority habitat in the WSP report. As the Report states:

While the concept of connecting landscapes for movement of fauna is important in guiding rehabilitation efforts, connectivity should prioritise the retention of potential or known habitat, and under the current scenario, almost 55% of the highest quality and highest potential habitat within Devon Meadows would be lost as it constitutes developable land.

(Casey Fields South and Devon Meadows Biodiversity Assessment Report 2025 Update, p. 5)

- No protections are in place to ensure protection of understorey. The WSP report states:

the consequence of removal of understorey habitat to facilitate construction of the drainage corridors, the anticipated reduction in habitat is expected to decimate any population of Southern Brown Bandicoot that may exist in the precinct if construction and habitat removal are not handled with careful consideration of Southern Brown Bandicoot.

(Casey Fields South and Devon Meadows Biodiversity Assessment Report 2025 Update, p. 5)

- The corridors do not reach the southern and eastern edges of the Devon Meadows precinct

- Connectivity should be provided between the two corridors in the Deven Meadows precinct. See Patch B in 1.3.5.
- Design of Casey Fields South needs to ensure that future connection (outside the PSP) between the two southern drainage lines within the PSP can occur.
- Areas of increased density will have undesirable impacts on the Southern Brown Bandicoot corridors unless strong provisions are in place to minimise those impacts: see 1.3.4 Interfaces with conservation areas.
- The corridors and public open space should be reconfigured to protect as much of the native grassland likely to be present: see 1.3.5 below.
- Revegetation needs to be thorough and carefully managed. Requirements need to be in place to ensure this occurs.
- The one Southern Brown Bandicoot Objective talks about the movement of the species. It should also talk about the habitat for ongoing occupation of the landscape.
- Similarly, R9 and R13 only talk about movement.
- Southern Brown Bandicoot corridors should be required to retain appropriate habitat wherever possible, and the location of those corridors should be chosen to maximise habitat retention.
- Requirements should be put in place to ensure Council comply with the provisions of the Melbourne Strategic Assessment. Banning cat ownership, and enforcing that ban, is a major issue here.
- In Botanic Ridge, large areas of good Southern Brown Bandicoot habitat were allowed to be cleared. That should not happen here.
- Not all drainage lines appear to be protected.

- The WSP report indicates that Southern Brown Bandicoot survey may be insufficient:

There is an absence of records of Southern Brown Bandicoot within the study area, which is likely due to a lack of survey effort within the precinct. To support design decisions, further targeted surveys within Devon Meadows are recommended if none have yet been undertaken.

(Casey Fields South and Devon Meadows Biodiversity Assessment Report 2025 Update, p. 7)

What assurances are in place that appropriate survey will be undertaken if it has not yet been?

Construction impacts to the Melbourne Water drainage lines are going to be large and extended in time. These will seriously affect any Southern Brown Bandicoot populations present. A survey is essential to avoid and minimise these impacts.

- Habitat corridors need to be as large as possible. The current corridor design appears extremely minimal. The WSP report states:

Southern Brown Bandicoots have been found persisting in narrow linear corridors (Maclagan, SJ et al. 2020), particularly where there is a broader population matrix. However, Masters, Taylor and Maclagan (2019) stated

corridors should be as wide as possible to maximise habitat potential. This is particularly important where the Southern Brown Bandicoot population may not currently be present or is in lower numbers, as expected in the study area. As such, habitat corridors should be 30 metres or greater, as suggested in (Masters, Taylor and MacLagan 2019). Ideally this would be the 'core area' as above with buffer areas either side.

(Casey Fields South and Devon Meadows Biodiversity Assessment Report 2025 Update, p. 15)

- Road crossings need to be best practice design. Currently there is no provision for how well these crossing structures need to be design.
- The PSP contains not provisions for how revegetation will occur, what species, what density.

1.3.4. Interfaces with conservation areas

The draft PSP needs to include more requirements focused on protecting and strengthening the environmental qualities of the waterways, other drainage assets and parklands from adjacent development. In particular:

- **Road interfaces** need to consider fauna movement. In places this means including under-road crossing structures; in other places it will mean preventing movement through fencing.
- **Lightspill** is not discussed. Lightspill needs to be controlled in all areas with conservation value. Consider light frequency and options for timing and movement activation, as well as ground-based lighting.
- **Overshadowing** needs to be regulated, especially since areas of increased density are being deliberately co-located with areas of high biodiversity significance. We welcome increased residential density, but not at the expense of the environment.
- Consider if **street trees** will impact conservation areas, either through overshadowing or groundwater consumption. Choice of species will be very important.
- Impacts of **sound** need to be minimised for fauna not just humans. High noise levels have well-documented impacts on fauna. Clause 58.04-3 (Noise impact objectives) of the planning scheme is probably not appropriate for fauna in a conservation area. Soundwalls should be considered where arterial roads interface areas of conservation significance. Traffic calming should also be in place on lower volume roads, and reducing speed limits should be considered. Road surface choice is also important.

Importantly, provision of crossing structures, appropriate fencing and other measures needs to be fully costed and required or else these measures will be cut from later design stages.

1.3.5. An important opportunity to co-locate remnant native vegetation and Public Open Space

Significant patches of native vegetation, in particular grassland, are present across the two PSPs.

There is a great opportunity to co-locate open space with these native vegetation patches. Wherever possible, efforts should be made to retain, improve, and make a feature of that

native vegetation in such instances. Park design can embrace and protect these important and Critically Endangered grasslands.

Despite a lack of reliable on-ground survey work ever being done for this PSP, e.g. though the Melbourne Strategic Assessment process, new mapping tools now give us good, reliable data on the presence of native grassland.

DEECA have access to this data, which was developed by ARI and paid for by Glenelg Hopkins CMA.

Four areas of grassland are of particular note. See Figure 1.

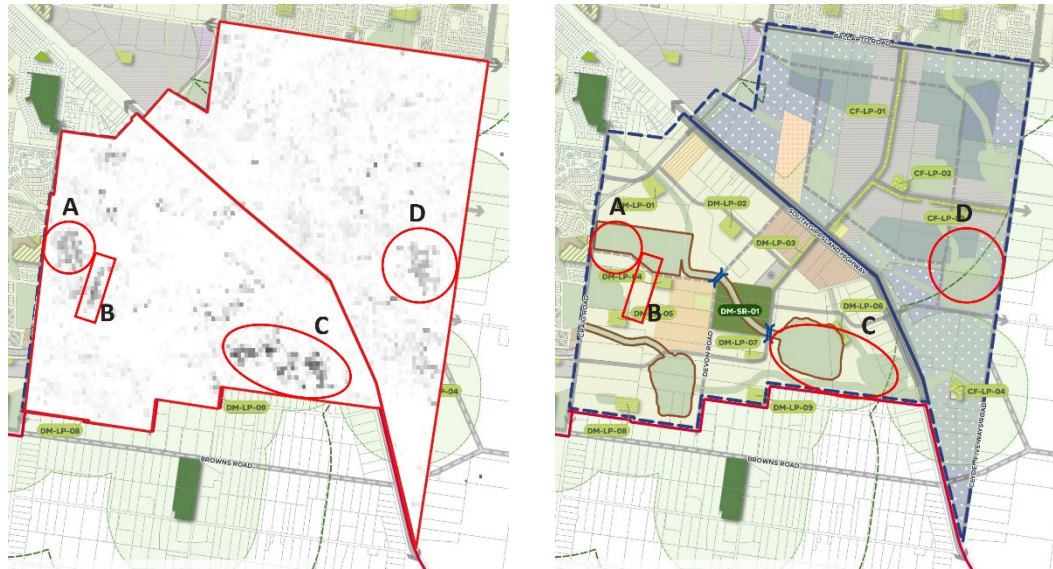


Figure 1. Image on left shows likelihood of native grassland presence, darker pixels indicating higher likelihood. Image on right shows key areas of grassland presence overlaid on PSP map. Data from ARI/GHCMA 2021.

Patch A: A restructuring of the shape of the drainage reserve would allow for more native grassland habitat to be retained within the Southern Brown Bandicoot habitat corridor, improving outcomes for the Southern Brown Bandicoot and native grasslands.

Patch B: The linear nature of this patch suggests a useful north–south connection between the two Southern Brown Bandicoot corridors. This would aid connectivity, build in redundancy, and improve gene flow.

Patch C: Again, some reconfiguring of drainage reserves shapes could allow more existing Southern Brown Bandicoot habitat and grassland to be retained.

Patch D: Some reconfiguring of drainage reserve shape could allow more grassland to be retained.

1.3.6. Good quality vegetation should not be cleared

It is clear from the photographic evidence provided that some areas of excellent habitat and natural values are going to be cleared. This is in part the fault of the MSA, but the VPA should take every opportunity to retain these areas within public open space.



It is absurd that natural bushland such as that pictured here is going to be cleared.

1.3.7. A southern conservation area

The dense line of high-value trees along the southern border of Devon Meadows should become a conservation area and public open space. See also discussion of grassland Patch C above.

1.3.8. Design of drainage assets

Drainage assets need to function as habitat. Melbourne Water has its guidelines around use of appropriate EVCs, but it would be worth strengthening those by inclusion within the PSP of requirements of ensure quality habitat for the native species calling these conservation assets home.

Drainage assets should be moved locally where possible to avoid impacts to high-value trees.

Drainage assets should retain native vegetation wherever possible.

1.3.9. Trees

Many high-value trees marked for retention are likely to be impacted by construction works, particularly those within Melbourne Water drainage assets.

At the moment R10.e will allow the clearing of trees. To prevent this happening, VPA will need to reconsider urban form to allow retention of these trees, and to clearly instruct Melbourne Water to avoid their clearing.

VPA should make genuine efforts to locate local parks in such a way as to protect high-value trees.

We support the implementation of AS4970-2009 Protection of trees on development sites on all indigenous remnant trees within the site. The loss of any remnant trees as part of this development should be avoided.

We support calls by the arborists to install *“Robust fencing or barriers must be in place to protect the TPZ of preserved trees for the duration of any works in their vicinity. The TPZ must not be used for any activity during any works”*. This must include all works including demolition works.

The documents state that *“For any trees retained it will be essential to design the sites and provide adequate space to ensure their Structural Root Zones and 90% of their Tree Protection Zones are adequately protected as stipulated by AS4970-2009 Protection of trees on development sites”*. This should be adhered to. In all stages of development all native indigenous trees should not be damaged or have any access allowed to their Tree Protection Zones. This is completely avoidable with a development such as this.

Retained remnant trees should be included in wildlife corridors. These should be no smaller than 50 meters wide with an additional 50-meter buffer from development sites to be maintained as a fire break via mowing. This will minimise native vegetation loss to fire break creation and will reduce the risk associated with trees.

Usable habitat corridors should be created and maintained to retained trees to allow local wildlife to use them and to remain ecologically functional.

1.3.10. Integrated Water Management

Integrated Water Management (IWM) solutions need to be at PSP scale and need to be driven by a single responsible authority. At the moment we have a poor situation where fallback PSP guidelines and options mean that IWM will be mostly ignored by developers.

The PSP should have water harvesting and a recycled water system such as Aurora has.